

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

FILED
IN CLERKS OFFICE

2005 FEB 18 A 10:51

05 10329 DPW

PATRICK AMBROSE, and others,
Plaintiffs

v.

TOWN OF DANVERS

Defendant

MAGISTRATE JUDGE

C.A. No.

U.S. DISTRICT COURT
DISTRICT OF MASS.

RECEIPT #

AMOUNT \$

SUMMONS ISSUED

LOCAL RULE 4.1

WAIVER FORM

MCF ISSUED

BY DPTY CLK.

DATE

COMPLAINT

A. NATURE OF THE ACTION

1. This is an action for damages and declaratory relief by current and retired police officers of the Town of Danvers and its Police Department for violations of the Fair Labor Standards Act ("FLSA"), 29 U.S.C., §201, et seq.

B. JURISDICTION AND VENUE

2. This Court has jurisdiction pursuant to 29 U.S.C., §216(b), and 28 U.S.C., §§1331 and 1337.

3. Declaratory relief is authorized by 22 U.S.C., §§2201 and 2202.

4. Venue is proper pursuant to 28 U.S.C., §1391(b).

PARTIES

5. Plaintiffs Patrick Ambrose, Richard E. Barthelmess, Stephen D. Baldassare, J., Michael Bean, Robert Bettencourt, William E. Broadstreet, Edward Campbell, William S. Carlson, Brian L. Caspanano, William J. Cassidy, Jr., Keith Chalmers, Justin Ellerton, Leonard Flynn, Jr., Scott Frost, James A. George, Carol A. Germano, Robert Gorman, Dana M. Hagan, Devin Janvrin, David S. Joyce, Daniel J. Kenneally,

Joseph Kolodzie, Craig A. Labastie, Roland Levasseur, William S. Loughlin, James P. Lovell, Steven McDonald, Dana K. Martin, John F. Melto, Dana L. Milne, Edmund M. Plamoski, Walter Roberts, Jr., Robert C. Santo, Peter Z. Shabowick, Olivia M. Silva, Jason Skane, Paul F. Stone, Richard A. Stoney, Robert J. Sullivan, Timothy J. Timmons, Timothy Williamson, Kevin Wood, David A. Wotovich, Timothy C. Zuck, are employed as regular Police Officers by the Town of Danvers, Massachusetts. Plaintiffs Robert L. Marino and Jon E. Tiplady are retired Town of Danvers Police Officers.

6. Each plaintiff has filed his/her consent as a party plaintiff pursuant to 29 U.S.C., §216(b).

7. Each plaintiff is or was an employee within 29 U.S.C., §203(e)(2)B.

8. Each plaintiff is or was a member of the Danvers Police Benevolent Association ("Union"). The Union is the exclusive representative of all regular employees of the Town of Danvers/Danvers Police Department for collective bargaining purposes.

9. Defendant Town of Danvers ("Town") is a municipality and a political subdivision of the Commonwealth; the Town is an employer within 29 U.S.C., §203(d).

GRAVAMEN

10. Defendant Town and the Union are parties to a Collective Bargaining Agreement ("CBA"), which establishes wages, hours and working conditions for all regular employees including plaintiffs.

11. The CBA provides, with certain exceptions, that plaintiffs shall work a "four and two" schedule. For example, an officer works Monday through Thursday with

Friday and Saturday off. In the next week this officer works Sunday through Wednesday with Thursday and Friday off. This cycle repeats every six (6) weeks.

12. Plaintiffs work an eight (8) hour shift.

13. Pursuant to the CBA, plaintiffs are entitled to receive annual payments for "longevity" based on years of service. Such payments range from \$175.00 after five (5) years service to \$625.00 after thirty (30) years of service.

14. Defendant Town does not include a plaintiff's longevity pay in his/her regular rate of pay when calculating a plaintiff's overtime pay.

15. Plaintiffs on regular night duty receive a night shift differential "equal to nine percent (9%) of their regular weeks' salaries.

16. Defendant Town does not include the night shift differential in the regular rate of pay when calculating the overtime pay of a plaintiff on regular night duty.

17. Plaintiffs who work as Detectives are paid an annual stipend.

18. Defendant Town does not include the stipend paid to plaintiffs working as Detectives in the regular rate of pay when calculating the overtime pay of plaintiffs working as Detectives.

19. Plaintiffs who are certified Emergency Medical Technicians are paid an annual stipend.

20. Defendant Town does not include the stipend paid to plaintiffs who are certified Emergency Technicians in their regular rate of pay when calculating the overtime pay of these plaintiffs.

21. Plaintiffs are required to attend two training sessions per month. Plaintiffs are not paid for the first two (2) hours of such sessions when a plaintiff must attend off his/her shift.

22. Plaintiffs who attend a training session that lasts more than two (2) hours are paid an applicable time and one half rate for such time in excess of two (2) hours.

23. Pay for training sessions in excess of two (2) hours are not included in the regular rate of pay when calculating plaintiffs' overtime pay.

24. Some plaintiffs are regularly scheduled as "House Officer" and are paid an annual stipend.

25. Defendant Town does not include the "House Officer" stipend paid to such plaintiffs in their regular rates of pay when calculating overtime pay.

26. Some plaintiffs receive base salary add-ons for associate's degrees in law enforcement, for baccalaureate degrees in law enforcement, and master's degrees in law enforcement pursuant to G.L. c.41, §108L.

27. Defendant Town does not include these educational base salary add-ons to eligible plaintiffs' regular rates of pay when calculating their overtime pay.

28. Defendant Town has never adopted (nor otherwise processed) a partial public safety exemption as provided in 29 U.S.C., §207(k), from the FLSA overtime requirements of 29 U.S.C., §207(a).

Therefore, Plaintiffs are entitled to FLSA premium pay for all hours worked over forty (40) hours in any seven (7) day period.

29. Upon information and belief, Defendant Town has been aware of its past and ongoing failures to comply with the FLSA and Regulations promulgated thereunder. Defendant Town's continued violations are willful within the meaning of 29. U.S.C., §255(a).

30. Defendant Town does not properly calculate plaintiffs regular rate of pay by failure to include in that rate: longevity pay, the night shift differential, the Detectives stipend, the EMT stipend, required training session payments, the "House Officer" stipend, and Education Base Salary Add-ons. Such past ongoing failures violate 29 U.S.C., §207(e).

CAUSES OF ACTION

COUNT I

FAILURE TO PAY FOR HOURS WORKED

31. Plaintiffs re-allege and incorporate by reference paragraphs 1 through 30 of their complaint.

32. The two (2) unpaid hours spent by plaintiffs in twice monthly required training sessions are hours worked within 29 U.S.C., §207(a), and 29 C.F.R., Section 785, et seq.

33. Defendant Town's failure to pay the first two (2) hours of twice monthly required training sessions has and does willfully violate 29 U.S.C., §207(a), 29 U.S.C., §215(a)(2), and 29 C.F.R., Sections 785, et seq.

COUNT II

UNDERPAYMENT OF OVERTIME

34. Plaintiffs re-allege and incorporate by reference paragraphs 1 through 30 of their complaint.

35. Defendant Town has willfully miscalculated the regular rate of pay for plaintiffs in violation of 29 U.S.C., §207(e), 29 U.S.C., §215(a)(2), C.F.R., Section 778.108 by its past and ongoing failures to include the longevity pay, the night shift

differential, the Detective's stipend, the EMT stipend, required training session payments, the "House Officer" stipend, and Educational Base Salary add-ons.

36. Defendant Town's willful miscalculation has caused Defendant Town's willful failure to pay plaintiffs overtime payments due them violates 29 U.S.C., §207(a), and 29 U.S.C., §215(a)(2).

JURY DEMAND

37. Plaintiffs demand a jury trial.

REQUESTS FOR RELIEF

38. Plaintiffs request this relief:

(A) Entry of a Declaratory Judgment declaring that Defendant Town must compensate plaintiffs pursuant to 29 U.S.C., §§207(a) and (e), by including longevity payments the night shift differential, the Detectives stipend, the Emergency Medical Technician stipend, any training session payments, the "House Officers" pay and Educational Incentive Pay add-ons.

(B) Entry of a Declaratory Judgment declaring that plaintiffs are entitled to overtime compensation for all hours worked in excess of forty (40) hours in any work weeks.

(C) Entry of a Declaratory Judgment declaring that the first two (2) hours of mandatory training sessions are hours worked by plaintiffs for which they must be compensated pursuant to 29 U.S.C., §207 and applicable regulations.

(D) Entry of Judgment against Defendant Town for all sums of unpaid compensation found due each plaintiff.

(E) Entry of Judgement awarding each plaintiff liquidated damages in an amount equal to all sums of unpaid compensation due him or her.

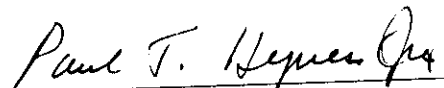
(F) Entry of Judgment awarding plaintiffs their reasonable attorneys fees and costs.

(G) Entry of such other and further relief as is appropriate.

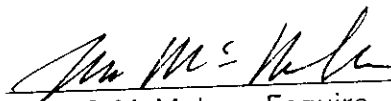
Respectfully submitted,

PATRICK AMBROSE, and others

By their attorneys,



Paul T. Hynes, Esquire
BBO# 545952



John F. McMahon, Esquire
BBO # 338360
ANGOFF, GOLDMAN, MANNING,
WANGER & HYNES, P.C.
45 Bromfield Street – 8th Floor
Boston, MA 02108
(617) 723-5500

Dated: 2/16/05

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

I. (a) PLAINTIFFS

PATRICK AMBROSE and others

(b) County of Residence of First Listed Plaintiff Essex
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorney's (Firm Name, Address, and Telephone Number) 617-723-5500
Paul T. Hynes, Esq.
Angoff, Goldman, Manning, Wanger & Hynes, P.C.
45 Bromfield Street, 8th Fl., Boston, MA 02108

DEFENDANTS

FILED
TOWN OF DANVERS and DANVERS POLICE DEPARTMENT

County of Residence of First Listed Defendant
2005 FEB 18 AM 10:55
(EXCEPT IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE LAND INVOLVED.

Attorneys (If Known) U.S. DISTRICT COURT
DISTRICT OF MASS.

II. BASIS OF JURISDICTION

(Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
☐ 2 U.S. Government Defendant
☒ 3 Federal Question (U.S. Government Not a Party)
☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES

(For Diversity Cases Only)

	PTF	DEF		PTF	DEF
Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4	<input type="checkbox"/> 4
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6

IV. NATURE OF SUIT

(Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury	<input type="checkbox"/> 362 Personal Injury - Med. Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus: <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition	LABOR <input checked="" type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	<input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609
				<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes

V. ORIGIN

(Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
☐ 2 Removed from State Court
☐ 3 Remanded from Appellate Court
☐ 4 Reinstated or Reopened
☐ 5 Transferred from another district (specify)
☐ 6 Multidistrict Litigation
☐ 7 Appeal to District Judge from Magistrate Judgment

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
29 U.S.C., §201 et seq.

Brief description of cause:

Fair Labor Standards Overtime and Hours Violations

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

DEMAND \$

CHECK YES only if demanded in complaint:

Not presently known JURY DEMAND: ☒ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE None

DOCKET NUMBER

DATE

2/16/05

SIGNATURE OF ATTORNEY OF RECORD

Paul T. Hynes, Esq.

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

1. Title of case (name of first party on each side only) PATRICK AMBROSE et al. v.
TOWN OF DANVERS
2. Category in which the case belongs based upon the numbered nature of suit code listed on the civil cover sheet. (See local rule 40.1(a)(1)).

2005 FEB 18 A 10:51

*Also complete AO 120 or AO 121
for patent, trademark or copyright cases

- I. 160, 410, 470, R.23, REGARDLESS OF NATURE OF SUIT.
- ☒ II. 195, 368, 400, 440, 441-444, 540, 550, 555, 625, 710, 720, 730,
740, 790, 791, 820*, 830*, 840*, 850, 890, 892-894, 895, 950.
- III. 110, 120, 130, 140, 151, 190, 210, 230, 240, 245, 290, 310,
315, 320, 330, 340, 345, 350, 355, 360, 362, 365, 370, 371,
380, 385, 450, 891.
- IV. 220, 422, 423, 430, 460, 510, 530, 610, 620, 630, 640, 650, 660,
690, 810, 861-865, 870, 871, 875, 900.
- V. 150, 152, 153.

05 10329 DPW

3. Title and number, if any, of related cases. (See local rule 40.1(g)). If more than one prior related case has been filed in this district please indicate the title and number of the first filed case in this court.

NONE

4. Has a prior action between the same parties and based on the same claim ever been filed in this court?

YES ☐ NO ☒

5. Does the complaint in this case question the constitutionality of an act of congress affecting the public interest? (See 28 USC §2403)

YES ☐ NO ☒

If so, is the U.S.A. or an officer, agent or employee of the U.S. a party?

YES ☐ NO ☒

6. Is this case required to be heard and determined by a district court of three judges pursuant to title 28 USC §2284?

YES ☐ NO ☒

7. Do all of the parties in this action, excluding governmental agencies of the united states and the Commonwealth of Massachusetts ("governmental agencies"), residing in Massachusetts reside in the same division? - (See Local Rule 40.1(d)).

YES ☒ NO ☐

- A. If yes, in which division do all of the non-governmental parties reside?

Eastern Division ☐Central Division ☐Western Division ☐

- B. If no, in which division do the majority of the plaintiffs or the only parties, excluding governmental agencies, residing in Massachusetts reside?

Eastern Division ☐Central Division ☐Western Division ☐

8. If filing a Notice of Removal - are there any motions pending in the state court requiring the attention of this Court? (If yes, submit a separate sheet identifying the motions)

YES ☐ NO ☐

(PLEASE TYPE OR PRINT)

ATTORNEY'S NAME Paul T. HynesADDRESS Angoff, Goldman, Manning, Wanger & Hynes, P.C.
45 Bromfield Street - 8th Floor, Boston, MA 02108TELEPHONE NO. 617-723-5500

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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PATRICK AMBROSE, and others,
Plaintiffs
v.
TOWN OF DANVERS
Defendant

C.A. No. _____

U.S. DISTRICT COURT
DISTRICT OF MASS.

05 CV 10329 DPW

NOTICE OF FILING OF WRITTEN CONSENTS

The employees listed on the attached Exhibit A file their written consents to become parties to this action.

Respectfully submitted,

PATRICK AMBROSE, and others

By their attorneys,

Paul T. Hynes (Per)

Paul T. Hynes, Esquire
BBO# 545952

John F. McMahon

John F. McMahon, Esquire
BBO # 338360
ANGOFF, GOLDMAN, MANNING,
WANGER & HYNES, P.C.
45 Bromfield Street – 8th Floor
Boston, MA 02108
(617) 723-5500

Dated: 2/16/05

EXHIBIT A

1.	Patrick Ambrose
2.	Richard E. Barthelmess
3.	Stephen D. Baldassare, J.
4.	Michael Bean
5.	Robert Bettencourt
6.	William E. Broadstreet
7.	Edward Campbell
8.	William S. Carlson
9.	Brian L. Caspanano
10.	William J. Cassidy, Jr.
11.	Keith Chalmers
12.	Justin Ellerton
13.	Leonard Flynn, Jr.
14.	Scott Frost
15.	James A. George
16.	Carol A. Germano
17.	Robert Gorman
18.	Dana M. Hagan
19.	Devin Janvrin
20.	David S. Joyce
21.	Daniel J. Kenneally
22.	Joseph Kolodzie
23.	Craig A. Labastie
24.	Roland Levasseur
25.	William S. Loughlin
26.	James P. Lovell
27.	Steven McDonald
28.	Dana K. Martin
29.	John F. Melto
30.	Dana L. Milne
31.	Edmund M. Plamoski
32.	Walter Roberts, Jr.
33.	Robert C. Santo
34.	Peter Z. Shabowick
35.	Olivia M. Silva
36.	Jason Skane
37.	Paul F. Stone
38.	Richard A. Stoney
39.	Robert J. Sullivan
40.	Timothy J. Timmons
41.	Timothy Williamson
42.	Kevin Wood
43.	David A. Wotovich
44.	Timothy C. Zuck
45.	Jon E. Tiplady
46.	Robert L. Marino

CONSENT AS PARTY PLAINTIFF

I, Patrick Ambrose, am employed as a regular police officer by the Town of Danvers or am presently retired from such employment.

I believe that my rights to proper compensation due me under the Fair Labor Standards Act have been and continue to be violated by my employer.

I consent to be a party plaintiff in any action by any active or retired regular police officer against the Town of Danvers for its violations of my FLSA rights and authorize the filing of my consent in such action pursuant to Section 216(b), FLSA 29 U.S.C. §216(b).

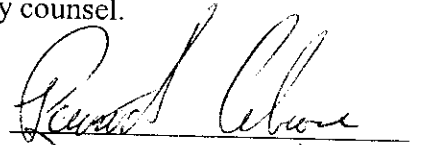
I authorize the law firm of Angoff, Goldman, Manning, Wanger & Hynes, P.C., 45 Bromfield Street – 8th Floor, Boston, MA 02108 to act as my counsel in such an action and I request that this Court assess costs, expenses, and a reasonable attorney's fees against the Town and award such assessments to my counsel.

Signature

Name (Print)

Identification No.

Date


Patrick Ambrose
16816
1/13/05

CONSENT AS PARTY PLAINTIFF


I, Richard E Barthelme, am employed as a regular police officer by the Town of Danvers or am presently retired from such employment.

I believe that my rights to proper compensation due me under the Fair Labor Standards Act have been and continue to be violated by my employer.

I consent to be a party plaintiff in any action by any active or retired regular police officer against the Town of Danvers for its violations of my FLSA rights and authorize the filing of my consent in such action pursuant to Section 216(b), FLSA 29 U.S.C. §216(b).

I authorize the law firm of Angoff, Goldman, Manning, Wanger & Hynes, P.C., 45 Bromfield Street – 8th Floor, Boston, MA 02108 to act as my counsel in such an action and I request that this Court assess costs, expenses, and a reasonable attorney's fees against the Town and award such assessments to my counsel.

Signature



Name (Print)

Richard E Barthelme

Identification No.

3269

Date

1-13-05

CONSENT AS PARTY PLAINTIFF


I, STEPHEN D. BALDASSARE JR., am employed as a regular police officer by the Town of Danvers or am presently retired from such employment.

I believe that my rights to proper compensation due me under the Fair Labor Standards Act have been and continue to be violated by my employer.

I consent to be a party plaintiff in any action by any active or retired regular police officer against the Town of Danvers for its violations of my FLSA rights and authorize the filing of my consent in such action pursuant to Section 216(b), FLSA 29 U.S.C. §216(b).

I authorize the law firm of Angoff, Goldman, Manning, Wanger & Hynes, P.C., 45 Bromfield Street – 8th Floor, Boston, MA 02108 to act as my counsel in such an action and I request that this Court assess costs, expenses, and a reasonable attorney's fees against the Town and award such assessments to my counsel.

Signature



Name (Print)

STEPHEN D BALDASSARE JR.

Identification No.

335

Date

1/13/05

CONSENT AS PARTY PLAINTIFF

I, Michael Bean, am employed as a regular police officer by the Town of Danvers or am presently retired from such employment.

I believe that my rights to proper compensation due me under the Fair Labor Standards Act have been and continue to be violated by my employer.

I consent to be a party plaintiff in any action by any active or retired regular police officer against the Town of Danvers for its violations of my FLSA rights and authorize the filing of my consent in such action pursuant to Section 216(b), FLSA 29 U.S.C. §216(b).

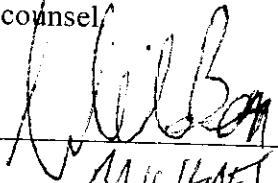
I authorize the law firm of Angoff, Goldman, Manning, Wanger & Hynes, P.C., 45 Bromfield Street – 8th Floor, Boston, MA 02108 to act as my counsel in such an action and I request that this Court assess costs, expenses, and a reasonable attorney's fees against the Town and award such assessments to my counsel.

Signature

Name (Print)

Identification No.

Date


MICHAEL BEAN
2576
1-16-05

CONSENT AS PARTY PLAINTIFF

I, Robert J. Bettencourt, am employed as a regular police officer by the Town of Danvers or am presently retired from such employment.

I believe that my rights to proper compensation due me under the Fair Labor Standards Act have been and continue to be violated by my employer.

I consent to be a party plaintiff in any action by any active or retired regular police officer against the Town of Danvers for its violations of my FLSA rights and authorize the filing of my consent in such action pursuant to Section 216(b), FLSA 29 U.S.C. §216(b).

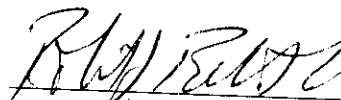
I authorize the law firm of Angoff, Goldman, Manning, Wanger & Hynes, P.C., 45 Bromfield Street – 8th Floor, Boston, MA 02108 to act as my counsel in such an action and I request that this Court assess costs, expenses, and a reasonable attorney's fees against the Town and award such assessments to my counsel.

Signature

Name (Print)

Identification No.

Date


Robert J. Bettencourt
401
1-13-05

CONSENT AS PARTY PLAINTIFF

I, WILLIAM E. BRADSTREET, am employed as a regular police officer by the Town of Danvers or am presently retired from such employment.

I believe that my rights to proper compensation due me under the Fair Labor Standards Act have been and continue to be violated by my employer.

I consent to be a party plaintiff in any action by any active or retired regular police officer against the Town of Danvers for its violations of my FLSA rights and authorize the filing of my consent in such action pursuant to Section 216(b), FLSA 29 U.S.C. §216(b).

I authorize the law firm of Angoff, Goldman, Manning, Wanger & Hynes, P.C., 45 Bromfield Street – 8th Floor, Boston, MA 02108 to act as my counsel in such an action and I request that this Court assess costs, expenses, and a reasonable attorney's fees against the Town and award such assessments to my counsel.

Signature

William E. Bradstreet

Name (Print)

WILLIAM E. BRADSTREET

Identification No.

222

Date

13 JAN 05

CONSENT AS PARTY PLAINTIFF

I, EDWARD CAMPBELL, am employed as a regular police officer by the Town of Danvers or am presently retired from such employment.

I believe that my rights to proper compensation due me under the Fair Labor Standards Act have been and continue to be violated by my employer.

I consent to be a party plaintiff in any action by any active or retired regular police officer against the Town of Danvers for its violations of my FLSA rights and authorize the filing of my consent in such action pursuant to Section 216(b), FLSA 29 U.S.C. § 216(b).


I authorize the law firm of Angoff, Goldman, Manning, Wanger & Hynes, P.C., 45 Bromfield Street – 8th Floor, Boston, MA 02108 to act as my counsel in such an action and I request that this Court assess costs, expenses, and a reasonable attorney's fees against the Town and award such assessments to my counsel.

Signature

Name (Print)

Identification No.

Date


EDWARD CAMPBELL
3170
1/18/05

CONSENT AS PARTY PLAINTIFF

I, William Carleton, am employed as a regular police officer by the Town of Danvers or am presently retired from such employment.

I believe that my rights to proper compensation due me under the Fair Labor Standards Act have been and continue to be violated by my employer.

I consent to be a party plaintiff in any action by any active or retired regular police officer against the Town of Danvers for its violations of my FLSA rights and authorize the filing of my consent in such action pursuant to Section 216(b), FLSA 29 U.S.C. § 216(b).

I authorize the law firm of Angoff, Goldman, Manning, Wanger & Hynes, P.C., 45 Bromfield Street – 8th Floor, Boston, MA 02108 to act as my counsel in such an action and I request that this Court assess costs, expenses, and a reasonable attorney's fees against the Town and award such assessments to my counsel.

Signature

Name (Print)

Identification No.

Date

William S. Carleton
William S. Carleton
183
1/13/05

CONSENT AS PARTY PLAINTIFF

I, BRIAN CASPARIAN, am employed as a regular police officer by the Town of Danvers or am presently retired from such employment.

I believe that my rights to proper compensation due me under the Fair Labor Standards Act have been and continue to be violated by my employer.

I consent to be a party plaintiff in any action by any active or retired regular police officer against the Town of Danvers for its violations of my FLSA rights and authorize the filing of my consent in such action pursuant to Section 216(b), FLSA 29 U.S.C. §216(b).

I authorize the law firm of Angoff, Goldman, Manning, Wanger & Hynes, P.C., 45 Bromfield Street – 8th Floor, Boston, MA 02108 to act as my counsel in such an action and I request that this Court assess costs, expenses, and a reasonable attorney's fees against the Town and award such assessments to my counsel.

Signature

Name (Print)

Identification No.

Date

Brian H. Casparian

BRIAN H. CASPARIAN

2535

01/16/05

CONSENT AS PARTY PLAINTIFF

I, William J. Cassidy Jr., am employed as a regular police officer by the Town of Danvers or am presently retired from such employment.

I believe that my rights to proper compensation due me under the Fair Labor Standards Act have been and continue to be violated by my employer.

I consent to be a party plaintiff in any action by any active or retired regular police officer against the Town of Danvers for its violations of my FLSA rights and authorize the filing of my consent in such action pursuant to Section 216(b), FLSA 29 U.S.C. §216(b).

I authorize the law firm of Angoff, Goldman, Manning, Wanger & Hynes, P.C., 45 Bromfield Street – 8th Floor, Boston, MA 02108 to act as my counsel in such an action and I request that this Court assess costs, expenses, and a reasonable attorney's fees against the Town and award such assessments to my counsel.

Signature

Name (Print)

Identification No.

Date

[Signature]
William J. Cassidy Jr.
178
1/13/05

CONSENT AS PARTY PLAINTIFF

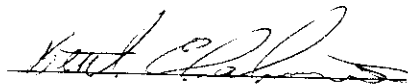
I, Kerth Chalmers, am employed as a regular police officer by the Town of Danvers or am presently retired from such employment.

I believe that my rights to proper compensation due me under the Fair Labor Standards Act have been and continue to be violated by my employer.

I consent to be a party plaintiff in any action by any active or retired regular police officer against the Town of Danvers for its violations of my FLSA rights and authorize the filing of my consent in such action pursuant to Section 216(b), FLSA 29 U.S.C. §216(b).

I authorize the law firm of Angoff, Goldman, Manning, Wanger & Hynes, P.C., 45 Bromfield Street – 8th Floor, Boston, MA 02108 to act as my counsel in such an action and I request that this Court assess costs, expenses, and a reasonable attorney's fees against the Town and award such assessments to my counsel.

Signature



Name (Print)

Kerth Chalmers

Identification No.

3140

Date

1/13/05

CONSENT AS PARTY PLAINTIFF

I, Justin Ellenton, am employed as a regular police officer by the Town of Danvers or am presently retired from such employment.

I believe that my rights to proper compensation due me under the Fair Labor Standards Act have been and continue to be violated by my employer.

I consent to be a party plaintiff in any action by any active or retired regular police officer against the Town of Danvers for its violations of my FLSA rights and authorize the filing of my consent in such action pursuant to Section 216(b), FLSA 29 U.S.C. §216(b).

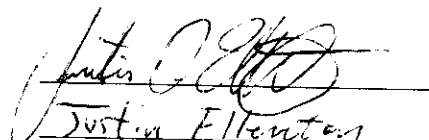
I authorize the law firm of Angoff, Goldman, Manning, Wanger & Hynes, P.C., 45 Bromfield Street – 8th Floor, Boston, MA 02108 to act as my counsel in such an action and I request that this Court assess costs, expenses, and a reasonable attorney's fees against the Town and award such assessments to my counsel.

Signature

Name (Print)

Identification No.

Date


Justin Ellenton
3207
01/13/05

CONSENT AS PARTY PLAINTIFF

I, Leonard Flynn Jr., am employed as a regular police officer by the Town of Danvers or am presently retired from such employment.

I believe that my rights to proper compensation due me under the Fair Labor Standards Act have been and continue to be violated by my employer.

I consent to be a party plaintiff in any action by any active or retired regular police officer against the Town of Danvers for its violations of my FLSA rights and authorize the filing of my consent in such action pursuant to Section 216(b), FLSA 29 U.S.C. § 216(b).

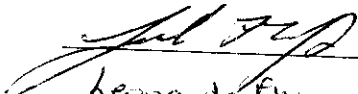
I authorize the law firm of Angoff, Goldman, Manning, Wanger & Hynes, P.C., 45 Bromfield Street – 8th Floor, Boston, MA 02108 to act as my counsel in such an action and I request that this Court assess costs, expenses, and a reasonable attorney's fees against the Town and award such assessments to my counsel.

Signature

Name (Print)

Identification No.

Date


Leonard Flynn Jr.
325
1-13-05

CONSENT AS PARTY PLAINTIFF

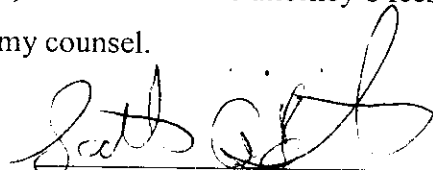
I, Scott Frost, am employed as a regular police officer by the Town of Danvers or am presently retired from such employment.

I believe that my rights to proper compensation due me under the Fair Labor Standards Act have been and continue to be violated by my employer.

I consent to be a party plaintiff in any action by any active or retired regular police officer against the Town of Danvers for its violations of my FLSA rights and authorize the filing of my consent in such action pursuant to Section 216(b), FLSA 29 U.S.C. §216(b).

I authorize the law firm of Angoff, Goldman, Manning, Wanger & Hynes, P.C., 45 Bromfield Street – 8th Floor, Boston, MA 02108 to act as my counsel in such an action and I request that this Court assess costs, expenses, and a reasonable attorney's fees against the Town and award such assessments to my counsel.

Signature



Name (Print)

Scott Frost

Identification No.

1606

Date

1-13-2004

CONSENT AS PARTY PLAINTIFF

I, JAMES A GEORGE, am employed as a regular police officer by the Town of Danvers or am presently retired from such employment.

I believe that my rights to proper compensation due me under the Fair Labor Standards Act have been and continue to be violated by my employer.

I consent to be a party plaintiff in any action by any active or retired regular police officer against the Town of Danvers for its violations of my FLSA rights and authorize the filing of my consent in such action pursuant to Section 216(b), FLSA 29 U.S.C. §216(b).

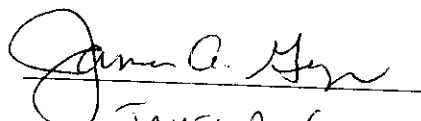
I authorize the law firm of Angoff, Goldman, Manning, Wanger & Hynes, P.C., 45 Bromfield Street – 8th Floor, Boston, MA 02108 to act as my counsel in such an action and I request that this Court assess costs, expenses, and a reasonable attorney's fees against the Town and award such assessments to my counsel.

Signature

Name (Print)

Identification No.

Date


JAMES A. GEORGE
1831
1-13-05

CONSENT AS PARTY PLAINTIFF

I, CAROLE A. GERMANO, am employed as a regular police officer by the Town of Danvers or am presently retired from such employment.

I believe that my rights to proper compensation due me under the Fair Labor Standards Act have been and continue to be violated by my employer.

I consent to be a party plaintiff in any action by any active or retired regular police officer against the Town of Danvers for its violations of my FLSA rights and authorize the filing of my consent in such action pursuant to Section 216(b), FLSA 29 U.S.C. §216(b).

I authorize the law firm of Angoff, Goldman, Manning, Wanger & Hynes, P.C., 45 Bromfield Street – 8th Floor, Boston, MA 02108 to act as my counsel in such an action and I request that this Court assess costs, expenses, and a reasonable attorney's fees against the Town and award such assessments to my counsel.

Signature



Name (Print)

CAROLE A. GERMANO

Identification No.

1715

Date

01/13/2005

CONSENT AS PARTY PLAINTIFF

I, Robert E. Gorman, am employed as a regular police officer by the Town of Danvers or am presently retired from such employment.

I believe that my rights to proper compensation due me under the Fair Labor Standards Act have been and continue to be violated by my employer.

I consent to be a party plaintiff in any action by any active or retired regular police officer against the Town of Danvers for its violations of my FLSA rights and authorize the filing of my consent in such action pursuant to Section 216(b), FLSA 29 U.S.C. § 216(b).

I authorize the law firm of Angoff, Goldman, Manning, Wanger & Hynes, P.C., 45 Bromfield Street – 8th Floor, Boston, MA 02108 to act as my counsel in such an action and I request that this Court assess costs, expenses, and a reasonable attorney's fees against the Town and award such assessments to my counsel.

Signature

Name (Print)

Identification No.

Date

[Signature]
Robert E. Gorman
140
1/13/05

CONSENT AS PARTY PLAINTIFF

I, DANA M HAGAN, am employed as a regular police officer by the Town of Danvers or am presently retired from such employment.

I believe that my rights to proper compensation due me under the Fair Labor Standards Act have been and continue to be violated by my employer.

I consent to be a party plaintiff in any action by any active or retired regular police officer against the Town of Danvers for its violations of my FLSA rights and authorize the filing of my consent in such action pursuant to Section 216(b), FLSA 29 U.S.C. §216(b).

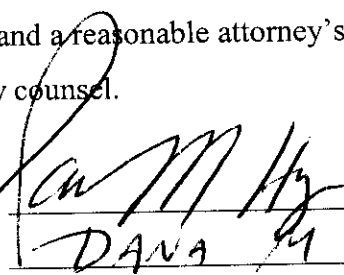
I authorize the law firm of Angoff, Goldman, Manning, Wanger & Hynes, P.C., 45 Bromfield Street – 8th Floor, Boston, MA 02108 to act as my counsel in such an action and I request that this Court assess costs, expenses, and a reasonable attorney's fees against the Town and award such assessments to my counsel.

Signature

Name (Print)

Identification No.

Date


DANA M HAGAN
196
1/13/05

CONSENT AS PARTY PLAINTIFF

I, KENNY JANZEN, am employed as a regular police officer by the Town of Danvers or am presently retired from such employment.

I believe that my rights to proper compensation due me under the Fair Labor Standards Act have been and continue to be violated by my employer.

I consent to be a party plaintiff in any action by any active or retired regular police officer against the Town of Danvers for its violations of my FLSA rights and authorize the filing of my consent in such action pursuant to Section 216(b), FLSA 29 U.S.C. §216(b).

I authorize the law firm of Angoff, Goldman, Manning, Wanger & Hynes, P.C., 45 Bromfield Street – 8th Floor, Boston, MA 02108 to act as my counsel in such an action and I request that this Court assess costs, expenses, and a reasonable attorney's fees against the Town and award such assessments to my counsel.

Signature

Name (Print)

Identification No.

Date

Kenny Janzen
KENNY JANZEN
876
1/14/05

CONSENT AS PARTY PLAINTIFF

I, David S. Joye, am employed as a regular police officer by the Town of Danvers or am presently retired from such employment.

I believe that my rights to proper compensation due me under the Fair Labor Standards Act have been and continue to be violated by my employer.

I consent to be a party plaintiff in any action by any active or retired regular police officer against the Town of Danvers for its violations of my FLSA rights and authorize the filing of my consent in such action pursuant to Section 216(b), FLSA 29 U.S.C. §216(b).

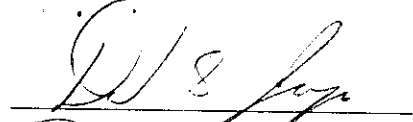
I authorize the law firm of Angoff, Goldman, Manning, Wanger & Hynes, P.C., 45 Bromfield Street – 8th Floor, Boston, MA 02108 to act as my counsel in such an action and I request that this Court assess costs, expenses, and a reasonable attorney's fees against the Town and award such assessments to my counsel.

Signature

Name (Print)

Identification No.

Date


David S Joye
1373
01/13/2005

CONSENT AS PARTY PLAINTIFF

I, DANIEL KENNEDY, am employed as a regular police officer by the Town of Danvers or am presently retired from such employment.

I believe that my rights to proper compensation due me under the Fair Labor Standards Act have been and continue to be violated by my employer.

I consent to be a party plaintiff in any action by any active or retired regular police officer against the Town of Danvers for its violations of my FLSA rights and authorize the filing of my consent in such action pursuant to Section 216(b), FLSA 29 U.S.C. §216(b).

I authorize the law firm of Angoff, Goldman, Manning, Wanger & Hynes, P.C., 45 Bromfield Street – 8th Floor, Boston, MA 02108 to act as my counsel in such an action and I request that this Court assess costs, expenses, and a reasonable attorney's fees against the Town and award such assessments to my counsel.

Signature

D. J. Kennedy

Name (Print)

DANIEL KENNEDY

Identification No.

1374

Date

1/13/05

CONSENT AS PARTY PLAINTIFF

I, Joseph Kolodziej, am employed as a regular police officer by the Town of Danvers or am presently retired from such employment.

I believe that my rights to proper compensation due me under the Fair Labor Standards Act have been and continue to be violated by my employer.

I consent to be a party plaintiff in any action by any active or retired regular police officer against the Town of Danvers for its violations of my FLSA rights and authorize the filing of my consent in such action pursuant to Section 216(b), FLSA 29 U.S.C. §216(b).

I authorize the law firm of Angoff, Goldman, Manning, Wanger & Hynes, P.C., 45 Bromfield Street – 8th Floor, Boston, MA 02108 to act as my counsel in such an action and I request that this Court assess costs, expenses, and a reasonable attorney's fees against the Town and award such assessments to my counsel.

Signature

Name (Print)

Identification No.

Date

Joseph Kolodziej
Joseph Kolodziej
700
1-13-05

CONSENT AS PARTY PLAINTIFF

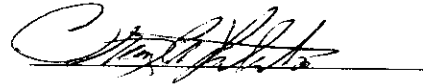
I, Craig A. Labastie, am employed as a regular police officer by the Town of Danvers or am presently retired from such employment.

I believe that my rights to proper compensation due me under the Fair Labor Standards Act have been and continue to be violated by my employer.

I consent to be a party plaintiff in any action by any active or retired regular police officer against the Town of Danvers for its violations of my FLSA rights and authorize the filing of my consent in such action pursuant to Section 216(b), FLSA 29 U.S.C. §216(b).

I authorize the law firm of Angoff, Goldman, Manning, Wanger & Hynes, P.C., 45 Bromfield Street – 8th Floor, Boston, MA 02108 to act as my counsel in such an action and I request that this Court assess costs, expenses, and a reasonable attorney's fees against the Town and award such assessments to my counsel.

Signature



Name (Print)

CRAIG A. LABASTIE

Identification No.

3245

Date

14 JAN 05

CONSENT AS PARTY PLAINTIFF

I, ROLAND LEVASSEUR, am employed as a regular police officer by the Town of Danvers or am presently retired from such employment.

I believe that my rights to proper compensation due me under the Fair Labor Standards Act have been and continue to be violated by my employer.

I consent to be a party plaintiff in any action by any active or retired regular police officer against the Town of Danvers for its violations of my FLSA rights and authorize the filing of my consent in such action pursuant to Section 216(b), FLSA 29 U.S.C. § 216(b).

I authorize the law firm of Angoff, Goldman, Manning, Wanger & Hynes, P.C., 45 Bromfield Street – 8th Floor, Boston, MA 02108 to act as my counsel in such an action and I request that this Court assess costs, expenses, and a reasonable attorney's fees against the Town and award such assessments to my counsel.

Signature

Roland Levasseur

Name (Print)

ROLAND LEVASSEUR

Identification No.

221

Date

1-13-05

CONSENT AS PARTY PLAINTIFF

I, WILLIAM S. LOUGHLIN, am employed as a regular police officer by the Town of Danvers or am presently retired from such employment.

I believe that my rights to proper compensation due me under the Fair Labor Standards Act have been and continue to be violated by my employer.

I consent to be a party plaintiff in any action by any active or retired regular police officer against the Town of Danvers for its violations of my FLSA rights and authorize the filing of my consent in such action pursuant to Section 216(b), FLSA 29 U.S.C. §216(b).

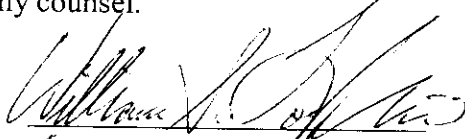
I authorize the law firm of Angoff, Goldman, Manning, Wanger & Hynes, P.C., 45 Bromfield Street – 8th Floor, Boston, MA 02108 to act as my counsel in such an action and I request that this Court assess costs, expenses, and a reasonable attorney's fees against the Town and award such assessments to my counsel.

Signature

Name (Print)

Identification No.

Date


WILLIAM S. LOUGHLIN
182
1-13-05

CONSENT AS PARTY PLAINTIFF

I, James P Lovell, am employed as a regular police officer by the Town of Danvers or am presently retired from such employment.

I believe that my rights to proper compensation due me under the Fair Labor Standards Act have been and continue to be violated by my employer.

I consent to be a party plaintiff in any action by any active or retired regular police officer against the Town of Danvers for its violations of my FLSA rights and authorize the filing of my consent in such action pursuant to Section 216(b), FLSA 29 U.S.C. §216(b).

I authorize the law firm of Angoff, Goldman, Manning, Wanger & Hynes, P.C., 45 Bromfield Street – 8th Floor, Boston, MA 02108 to act as my counsel in such an action and I request that this Court assess costs, expenses, and a reasonable attorney's fees against the Town and award such assessments to my counsel.

Signature	<u>James P Lovell</u>
Name (Print)	<u>James P. Lovell</u>
Identification No.	<u>#109</u>
Date	<u>1-13-05</u>

CONSENT AS PARTY PLAINTIFF

I, STEVEN MACDONALD, am employed as a regular police officer by the Town of Danvers or am presently retired from such employment.

I believe that my rights to proper compensation due me under the Fair Labor Standards Act have been and continue to be violated by my employer.

I consent to be a party plaintiff in any action by any active or retired regular police officer against the Town of Danvers for its violations of my FLSA rights and authorize the filing of my consent in such action pursuant to Section 216(b), FLSA 29 U.S.C. § 216(b).

I authorize the law firm of Angoff, Goldman, Manning, Wanger & Hynes, P.C., 45 Bromfield Street – 8th Floor, Boston, MA 02108 to act as my counsel in such an action and I request that this Court assess costs, expenses, and a reasonable attorney's fees against the Town and award such assessments to my counsel.

Signature

Steven Macdonald

Name (Print)

Steven Macdonald

Identification No.

1074

Date

1-13-05

CONSENT AS PARTY PLAINTIFF

I, Dana K. Martin, am employed as a regular police officer by the Town of Danvers or am presently retired from such employment.

I believe that my rights to proper compensation due me under the Fair Labor Standards Act have been and continue to be violated by my employer.

I consent to be a party plaintiff in any action by any active or retired regular police officer against the Town of Danvers for its violations of my FLSA rights and authorize the filing of my consent in such action pursuant to Section 216(b), FLSA 29 U.S.C. § 216(b).

I authorize the law firm of Angoff, Goldman, Manning, Wanger & Hynes, P.C., 45 Bromfield Street – 8th Floor, Boston, MA 02108 to act as my counsel in such an action and I request that this Court assess costs, expenses, and a reasonable attorney's fees against the Town and award such assessments to my counsel.

Signature

Name (Print)

Identification No.

Date

Dana K. Martin
DANA K. MARTIN
224
1/13/08

CONSENT AS PARTY PLAINTIFF

I, John J. McNeil, am employed as a regular police officer by the Town of Danvers or am presently retired from such employment.

I believe that my rights to proper compensation due me under the Fair Labor Standards Act have been and continue to be violated by my employer.

I consent to be a party plaintiff in any action by any active or retired regular police officer against the Town of Danvers for its violations of my FLSA rights and authorize the filing of my consent in such action pursuant to Section 216(b), FLSA 29 U.S.C. §216(b).

I authorize the law firm of Angoff, Goldman, Manning, Wanger & Hynes, P.C. , 45 Bromfield Street – 8th Floor, Boston, MA 02108 to act as my counsel in such an action and I request that this Court assess costs, expenses, and a reasonable attorney's fees against the Town and award such assessments to my counsel.

Signature

Name (Print)

Identification No.

Date

John J. McNeil
John J. McNeil
0912
2/18/05

CONSENT AS PARTY PLAINTIFF

I, DANA L. Milne, am employed as a regular police officer by the Town of Danvers or am presently retired from such employment.

I believe that my rights to proper compensation due me under the Fair Labor Standards Act have been and continue to be violated by my employer.

I consent to be a party plaintiff in any action by any active or retired regular police officer against the Town of Danvers for its violations of my FLSA rights and authorize the filing of my consent in such action pursuant to Section 216(b), FLSA 29 U.S.C. §216(b).

I authorize the law firm of Angoff, Goldman, Manning, Wanger & Hynes, P.C., 45 Bromfield Street – 8th Floor, Boston, MA 02108 to act as my counsel in such an action and I request that this Court assess costs, expenses, and a reasonable attorney's fees against the Town and award such assessments to my counsel.

Signature

Dana L. Milne

Name (Print)

DANA L. Milne

Identification No.

189

Date

1-13-05

CONSENT AS PARTY PLAINTIFF

I, Edmund M. Plamowski, am employed as a regular police officer by the Town of Danvers or am presently retired from such employment.

I believe that my rights to proper compensation due me under the Fair Labor Standards Act have been and continue to be violated by my employer.

I consent to be a party plaintiff in any action by any active or retired regular police officer against the Town of Danvers for its violations of my FLSA rights and authorize the filing of my consent in such action pursuant to Section 216(b), FLSA 29 U.S.C. §216(b).

I authorize the law firm of Angoff, Goldman, Manning, Wanger & Hynes, P.C., 45 Bromfield Street – 8th Floor, Boston, MA 02108 to act as my counsel in such an action and I request that this Court assess costs, expenses, and a reasonable attorney's fees against the Town and award such assessments to my counsel.

Signature

Edmund M. Plamowski

Name (Print)

Edmund M. Plamowski

Identification No.

1375

Date

1-13-2005

CONSENT AS PARTY PLAINTIFF

I, WALTER ROBERTS JR., am employed as a regular police officer by the Town of Danvers or am presently retired from such employment.

I believe that my rights to proper compensation due me under the Fair Labor Standards Act have been and continue to be violated by my employer.

I consent to be a party plaintiff in any action by any active or retired regular police officer against the Town of Danvers for its violations of my FLSA rights and authorize the filing of my consent in such action pursuant to Section 216(b), FLSA 29 U.S.C. §216(b).

I authorize the law firm of Angoff, Goldman, Manning, Wanger & Hynes, P.C., 45 Bromfield Street – 8th Floor, Boston, MA 02108 to act as my counsel in such an action and I request that this Court assess costs, expenses, and a reasonable attorney's fees against the Town and award such assessments to my counsel.

Signature

Walter Roberts Jr.

Name (Print)

WALTER ROBERTS JR.

Identification No.

207

Date

01-14-05

CONSENT AS PARTY PLAINTIFF

I, ROBERT C. SANTO, am employed as a regular police officer by the Town of Danvers or am presently retired from such employment.

I believe that my rights to proper compensation due me under the Fair Labor Standards Act have been and continue to be violated by my employer.

I consent to be a party plaintiff in any action by any active or retired regular police officer against the Town of Danvers for its violations of my FLSA rights and authorize the filing of my consent in such action pursuant to Section 216(b), FLSA 29 U.S.C. §216(b).

I authorize the law firm of Angoff, Goldman, Manning, Wanger & Hynes, P.C., 45 Bromfield Street – 8th Floor, Boston, MA 02108 to act as my counsel in such an action and I request that this Court assess costs, expenses, and a reasonable attorney's fees against the Town and award such assessments to my counsel.

Signature

Robert C. Santo

Name (Print)

ROBERT C. SANTO

Identification No.

1534

Date

1/13/05

CONSENT AS PARTY PLAINTIFF

I, Peter Z. Shebowich, am employed as a regular police officer by the Town of Danvers or am presently retired from such employment.

I believe that my rights to proper compensation due me under the Fair Labor Standards Act have been and continue to be violated by my employer.

I consent to be a party plaintiff in any action by any active or retired regular police officer against the Town of Danvers for its violations of my FLSA rights and authorize the filing of my consent in such action pursuant to Section 216(b), FLSA 29 U.S.C. §216(b).

I authorize the law firm of Angoff, Goldman, Manning, Wanger & Hynes, P.C., 45 Bromfield Street – 8th Floor, Boston, MA 02108 to act as my counsel in such an action and I request that this Court assess costs, expenses, and a reasonable attorney's fees against the Town and award such assessments to my counsel.

Signature

Peter Z. Shebowich

Name (Print)

Peter Z. Shebowich

Identification No.

2214

Date

1-13-05

CONSENT AS PARTY PLAINTIFF

I, OLIVIA M. SILVA, am employed as a regular police officer by the Town of Danvers or am presently retired from such employment.

I believe that my rights to proper compensation due me under the Fair Labor Standards Act have been and continue to be violated by my employer.

I consent to be a party plaintiff in any action by any active or retired regular police officer against the Town of Danvers for its violations of my FLSA rights and authorize the filing of my consent in such action pursuant to Section 216(b), FLSA 29 U.S.C. §216(b).

I authorize the law firm of Angoff, Goldman, Manning, Wanger & Hynes, P.C., 45 Bromfield Street – 8th Floor, Boston, MA 02108 to act as my counsel in such an action and I request that this Court assess costs, expenses, and a reasonable attorney's fees against the Town and award such assessments to my counsel.

Signature



Name (Print)

OLIVIA M. SILVA

Identification No.

2160

Date

1-13-05

CONSENT AS PARTY PLAINTIFF

I, Jason Skene, am employed as a regular police officer by the Town of Danvers or am presently retired from such employment.

I believe that my rights to proper compensation due me under the Fair Labor Standards Act have been and continue to be violated by my employer.

I consent to be a party plaintiff in any action by any active or retired regular police officer against the Town of Danvers for its violations of my FLSA rights and authorize the filing of my consent in such action pursuant to Section 216(b), FLSA 29 U.S.C. § 216(b).

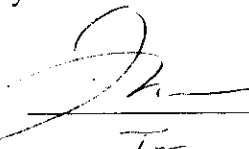
I authorize the law firm of Angoff, Goldman, Manning, Wanger & Hynes, P.C., 45 Bromfield Street – 8th Floor, Boston, MA 02108 to act as my counsel in such an action and I request that this Court assess costs, expenses, and a reasonable attorney's fees against the Town and award such assessments to my counsel.

Signature

Name (Print)

Identification No.

Date


Jason Skene
1077
1-18-05

CONSENT AS PARTY PLAINTIFF

I, Paul Stone, am employed as a regular police officer by the Town of Danvers or am presently retired from such employment.

I believe that my rights to proper compensation due me under the Fair Labor Standards Act have been and continue to be violated by my employer.

I consent to be a party plaintiff in any action by any active or retired regular police officer against the Town of Danvers for its violations of my FLSA rights and authorize the filing of my consent in such action pursuant to Section 216(b), FLSA 29 U.S.C. § 216(b).

I authorize the law firm of Angoff, Goldman, Manning, Wanger & Hynes, P.C., 45 Bromfield Street – 8th Floor, Boston, MA 02108 to act as my counsel in such an action and I request that this Court assess costs, expenses, and a reasonable attorney's fees against the Town and award such assessments to my counsel.

Signature

Name (Print)

Identification No.

Date

Paul E. Stone
Paul Stone
627
1/13/05

CONSENT AS PARTY PLAINTIFF

I, Richard A. Stovey, am employed as a regular police officer by the Town of Danvers or am presently retired from such employment.

I believe that my rights to proper compensation due me under the Fair Labor Standards Act have been and continue to be violated by my employer.

I consent to be a party plaintiff in any action by any active or retired regular police officer against the Town of Danvers for its violations of my FLSA rights and authorize the filing of my consent in such action pursuant to Section 216(b), FLSA 29 U.S.C. §216(b).


I authorize the law firm of Angoff, Goldman, Manning, Wanger & Hynes, P.C., 45 Bromfield Street – 8th Floor, Boston, MA 02108 to act as my counsel in such an action and I request that this Court assess costs, expenses, and a reasonable attorney's fees against the Town and award such assessments to my counsel.

Signature

Name (Print)

Identification No.

Date

 #205
Richard A. Stovey
205
1-13-05

CONSENT AS PARTY PLAINTIFF

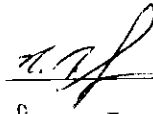
I, Robert J. Sullivan, am employed as a regular police officer by the Town of Danvers or am presently retired from such employment.

I believe that my rights to proper compensation due me under the Fair Labor Standards Act have been and continue to be violated by my employer.

I consent to be a party plaintiff in any action by any active or retired regular police officer against the Town of Danvers for its violations of my FLSA rights and authorize the filing of my consent in such action pursuant to Section 216(b), FLSA 29 U.S.C. §216(b).

I authorize the law firm of Angoff, Goldman, Manning, Wanger & Hynes, P.C. , 45 Bromfield Street – 8th Floor, Boston, MA 02108 to act as my counsel in such an action and I request that this Court assess costs, expenses, and a reasonable attorney's fees against the Town and award such assessments to my counsel.

Signature



Name (Print)

Robert J. Sullivan

Identification No.

989

Date

1-14-05

CONSENT AS PARTY PLAINTIFF

TIMOTHY J TIMMONS

I, *TJ Timmons*, am employed as a regular police officer by the Town of Danvers or am presently retired from such employment.

I believe that my rights to proper compensation due me under the Fair Labor Standards Act have been and continue to be violated by my employer.

I consent to be a party plaintiff in any action by any active or retired regular police officer against the Town of Danvers for its violations of my FLSA rights and authorize the filing of my consent in such action pursuant to Section 216(b), FLSA 29 U.S.C. § 216(b).

I authorize the law firm of Angoff, Goldman, Manning, Wanger & Hynes, P.C., 45 Bromfield Street – 8th Floor, Boston, MA 02108 to act as my counsel in such an action and I request that this Court assess costs, expenses, and a reasonable attorney's fees against the Town and award such assessments to my counsel.

Signature

Name (Print)

Identification No.

Date

[Handwritten Signature]
TJ Timmons
2734
01-13-05

CONSENT AS PARTY PLAINTIFF

I, Timothy Williamson, am employed as a regular police officer by the Town of Danvers or am presently retired from such employment.

I believe that my rights to proper compensation due me under the Fair Labor Standards Act have been and continue to be violated by my employer.

I consent to be a party plaintiff in any action by any active or retired regular police officer against the Town of Danvers for its violations of my FLSA rights and authorize the filing of my consent in such action pursuant to Section 216(b), FLSA 29 U.S.C. §216(b).

I authorize the law firm of Angoff, Goldman, Manning, Wanger & Hynes, P.C., 45 Bromfield Street – 8th Floor, Boston, MA 02108 to act as my counsel in such an action and I request that this Court assess costs, expenses, and a reasonable attorney's fees against the Town and award such assessments to my counsel.

Signature

Timothy Williamson

Name (Print)

Timothy Williamson

Identification No.

1110

Date

01/13/05

CONSENT AS PARTY PLAINTIFF

I, KEVIN WOOD, am employed as a regular police officer by the Town of Danvers or am presently retired from such employment.

I believe that my rights to proper compensation due me under the Fair Labor Standards Act have been and continue to be violated by my employer.

I consent to be a party plaintiff in any action by any active or retired regular police officer against the Town of Danvers for its violations of my FLSA rights and authorize the filing of my consent in such action pursuant to Section 216(b), FLSA 29 U.S.C. §216(b).

I authorize the law firm of Angoff, Goldman, Manning, Wanger & Hynes, P.C., 45 Bromfield Street – 8th Floor, Boston, MA 02108 to act as my counsel in such an action and I request that this Court assess costs, expenses, and a reasonable attorney's fees against the Town and award such assessments to my counsel.

Signature

Kevin Wood

Name (Print)

KEVIN WOOD

Identification No.

3129

Date

01-13-05

CONSENT AS PARTY PLAINTIFF

I, David G Woytowich, am employed as a regular police officer by the Town of Danvers or am presently retired from such employment.

I believe that my rights to proper compensation due me under the Fair Labor Standards Act have been and continue to be violated by my employer.

I consent to be a party plaintiff in any action by any active or retired regular police officer against the Town of Danvers for its violations of my FLSA rights and authorize the filing of my consent in such action pursuant to Section 216(b), FLSA 29 U.S.C. §216(b).

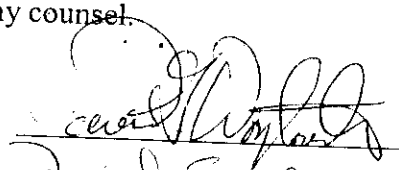
I authorize the law firm of Angoff, Goldman, Manning, Wanger & Hynes, P.C., 45 Bromfield Street – 8th Floor, Boston, MA 02108 to act as my counsel in such an action and I request that this Court assess costs, expenses, and a reasonable attorney's fees against the Town and award such assessments to my counsel.

Signature

Name (Print)

Identification No.

Date


David G Woytowich
192
1-14-05

CONSENT AS PARTY PLAINTIFF

I, Timothy C. Zuch, am employed as a regular police officer by the Town of Danvers or am presently retired from such employment.

I believe that my rights to proper compensation due me under the Fair Labor Standards Act have been and continue to be violated by my employer.

I consent to be a party plaintiff in any action by any active or retired regular police officer against the Town of Danvers for its violations of my FLSA rights and authorize the filing of my consent in such action pursuant to Section 216(b), FLSA 29 U.S.C. §216(b).

I authorize the law firm of Angoff, Goldman, Manning, Wanger & Hynes, P.C., 45 Bromfield Street – 8th Floor, Boston, MA 02108 to act as my counsel in such an action and I request that this Court assess costs, expenses, and a reasonable attorney's fees against the Town and award such assessments to my counsel.

Signature

Timothy C. Zuch

Name (Print)

Timothy C. Zuch

Identification No.

297

Date

1-13-2005

CONSENT AS PARTY PLAINTIFF

I, Jon E. Tiplady, am employed as a regular police officer by the Town of Danvers or am presently retired from such employment.

I believe that my rights to proper compensation due me under the Fair Labor Standards Act have been and continue to be violated by my employer.

I consent to be a party plaintiff in any action by any active or retired regular police officer against the Town of Danvers for its violations of my FLSA rights and authorize the filing of my consent in such action pursuant to Section 216(b), FLSA 29 U.S.C. §216(b).

I authorize the law firm of Angoff, Goldman, Manning, Wanger & Hynes, P.C., 45 Bromfield Street – 8th Floor, Boston, MA 02108 to act as my counsel in such an action and I request that this Court assess costs, expenses, and a reasonable attorney's fees against the Town and award such assessments to my counsel.

Signature

Name (Print)

Identification No.

Date

Jon E. Tiplady
Jon E. Tiplady
157
1-14-2005

CONSENT AS PARTY PLAINTIFF

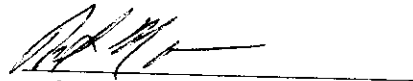
I, ROBERT L MARINO, am employed as a regular police officer by the Town of Danvers or am presently retired from such employment.

I believe that my rights to proper compensation due me under the Fair Labor Standards Act have been and continue to be violated by my employer.

I consent to be a party plaintiff in any action by any active or retired regular police officer against the Town of Danvers for its violations of my FLSA rights and authorize the filing of my consent in such action pursuant to Section 216(b), FLSA 29 U.S.C. § 216(b).

I authorize the law firm of Angoff, Goldman, Manning, Wanger & Hynes, P.C., 45 Bromfield Street – 8th Floor, Boston, MA 02108 to act as my counsel in such an action and I request that this Court assess costs, expenses, and a reasonable attorney's fees against the Town and award such assessments to my counsel.

Signature



Name (Print)

ROBERT L. MARINO

Identification No.

Date

1-14-05